

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

Chapter 11

Blitman Saratoga LLC,

Case No. 20-23177 (RDD)

Debtor.

**APPLICATION IN SUPPORT OF THE RETENTION OF GOLDBERG WEPRIN
FINKEL GOLDSTEIN LLP AS BANKRUPTCY COUNSEL**

**TO THE HONORABLE ROBERT D. DRAIN,
UNITED STATES BANKRUPTCY JUDGE:**

The application of Blitman Saratoga LLC, the Debtor herein, in support of the proposed retention of Goldberg Weprin Finkel Goldstein LLP (“GWFG”) as its bankruptcy counsel, represents as follows:

1. The Debtor filed a voluntary petition under Chapter 11 of the Bankruptcy Code on November 6, 2020, and thereafter has continued in possession and management of its assets as a debtor-in-possession pursuant to 11 U.S.C. §§1107 and 1108.

2. The Debtor is the owner of a residential development project known as “Beaver Pon”, which is substantially complete, except for ongoing construction regarding eight (8) remaining contracts. The Debtor sought Chapter 11 so as to be in position to complete the project despite an internal dispute between the majority investors and Howard Blitman (since deceased).

3. In furtherance of the Chapter 11 case, the Debtor now seeks to retain the law firm of Goldberg Weprin Finkel Goldstein LLP as bankruptcy counsel to provide various legal services, including:

- a. To provide the Debtor with all necessary representation in connection with this Chapter 11 case, as well as the Debtor's responsibilities as debtor-in-possession.
- b. To represent the Debtor in all proceedings before the U.S. Bankruptcy Court and the Office of the U.S. Trustee.
- c. To review, prepare and file all necessary legal papers, applications, motions, objections, adversary proceedings, and reports on the Debtor's behalf.
- d. To render all other legal services required by the Debtor toward the goal of achieving confirmation of a plan of reorganization.

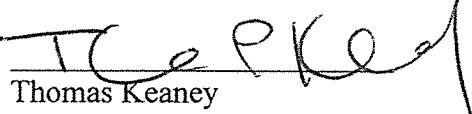
4. The Debtor believes that GWFG qualified to represent the Debtor herein, and is sufficiently disinterested within the meaning of the Bankruptcy Code to serve as counsel.

5. GWFG is not a creditor of the Debtor, and does not hold an adverse interest to the Debtor or the Debtor's estate.

WHEREFORE, the Debtor requests entry of the pre-fixed order authorizing the retention of Goldberg Weprin Finkel Goldstein LLP as bankruptcy counsel.

Dated: New York, New York
February 11, 2021

Blitman Saratoga LLC

By: 
Thomas Keaney